

Attorneys for Plaintiffs

1800 SOUTH MAPLE STREET, LLC, a) CASE NO. 07-CV-2030
California Limited Liability Company;)
RALPH J. GIANNELLA, an individual;)
GIANNELLA PROPERTIES, INC., a) **DECLARATION OF NEAL H.**
California Corporation; WILLIAM G.) **ROCKWOOD IN SUPPORT OF**
Ayyad, an individual; WILLIAM G.) **PLAINTIFFS' EX PARTE MOTION FOR**
Ayyad, INC., a California Corporation; and) **A STAY OF THIS MATTER PENDING**
PREMIER COMMUNITIES, LLC, a) **RESOLUTION OF PLAINTIFFS'**
California Limited Liability Company.) **MOTION TO AMEND THEIR**
) **COMPLAINT**

Plaintiffs,

V.

ALLIED PROPERTY AND CASUALTY
INSURANCE COMPANY, an Iowa
Corporation; AMCO INSURANCE
COMPANY, an Iowa Corporation;
NATIONWIDE MUTUAL INSURANCE
COMPANY, an Ohio Corporation, and DOES
1 through 100, inclusive,

Defendants.

I, Neal H. Rockwood, declare:

1. I am an attorney with the law firm of Rockwood & Noziska, LLP and an attorney of record for Plaintiffs 1800 SOUTH MAPLE STREET, LLC., RALPH J. GIANNELLA,

1 GIANNELLA PROPERTIES, INC., WILLIAM G. AYYAD, WILLIAM G. AYYAD, INC.,
2 and PREMIER COMMUNITIES, LLC I have personal knowledge of the facts attested to
3 herein, and if called as a witness, I am competent to testify under oath thereto.

4 2. Pursuant to CivLR 83.3(h), all parties were put on notice of this ex parte
5 application on January 28, 2008, via facsimile.

6 3. Attached to this declaration as Exhibit "A," is a true and correct copy of the
7 Order following the Early Neutral Evaluation Conference dated January 10, 2008.

8 4. Attached to this declaration as Exhibit "B," is a true and correct copy of
9 AMCO's denial letter dated March 3, 2006.

10 5. Attached to this declaration as Exhibit "C," is a true and correct copy of
11 correspondence from AMCO dated January 15, 2008.

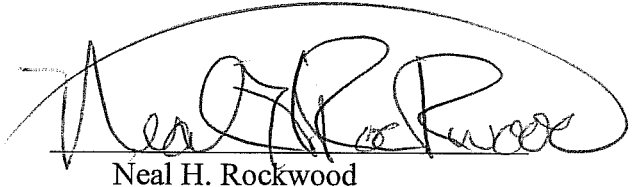
12 6. Attached to this declaration as Exhibit "D," is a true and correct copy of
13 correspondence from Plaintiffs to AMCO dated January 15, 2008.

14 7. Attached is a proposed order granting the application. On behalf of the
15 Plaintiffs, I respectfully request the Court to grant the following stay on this matter pending
16 resolution of Plaintiffs' motion to amend their complaint.

17 8. The undersigned hereby certifies that the application for order for a stay of this
18 matter pending resolution of Plaintiffs' motion to amend their complaint is made in good faith
19 and for good cause.

20 I declare under penalty of perjury and the laws of the State of California, that the
21 foregoing is true and correct and that this declaration is executed on January 28, 2008, at San
22 Diego, California.

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Neal H. Rockwood